

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 05-10220-NMG
)
 JAMES D. GOODWYN)

DEFENDANT'S ASSENTED-TO MOTION
TO ENLARGE TIME FOR FILING JOINT STATUS REPORT

Defendant, James D. Goodwyn, respectfully moves this Court for an additional thirty days to file a joint status report concerning defendant's eligibility for a reduction in sentence pursuant to 18 U.S.C. § 3582(c)(2).

As grounds for this motion, undersigned counsel states as follows:

2. On March 18, 2008 this Court issued a procedural order regarding defendant's motion requiring that within twenty days the parties file a joint status report concerning defendant's eligibility for a reduction in sentence pursuant to 18 U.S.C. § 3582(c)(2).

3. Undersigned counsel has been appointed in a several crack cocaine retroactivity cases, and in this particular case, needs additional time to review the pertinent underlying documents to assess defendant's potential eligibility for relief under 18 U.S.C. § 3582(c)(2).

4. Defendant's scheduled release date is August 26, 2019.

Assistant United States Attorney Glenn MacKinlay assents to
this motion.

JAMES D. GOODWYN
By his attorney,

/s/ Stylianus Sinnis
Stylianus Sinnis
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CERTIFICATE OF SERVICE

I, Stylianus Sinnis, hereby certify that this document filed
through the ECF system will be sent electronically to the
registered participants as identified on the Notice of Electronic
Filing (NEF) on March 28, 2008.

/s/ Stylianus Sinnis
Stylianus Sinnis